

SYMBOL TECHNOLOGIES, INC.
STATEMENT OF CORPORATE POLICY AND CODE OF CONDUCT

This Statement of Corporate Policy and Code of Conduct (the “**Statement**”) was adopted by the Board of Directors (the “**Board**”) of Symbol Technologies, Inc. (the “**Company**”) on January 14, 2004 and amended as of December 1, 2005.

I. Introduction and General Statement

It has always been the policy of Symbol Technologies, Inc. and all of its domestic and foreign subsidiaries (“**Symbol**” or the “**Company**”), to comply with the law and to conduct its affairs in keeping with the highest moral, legal and ethical standards in every country where it operates. We will conduct our business with integrity, in relation to customers, suppliers, competitors and all others with whom we deal. All associates are required to perform their duties honestly, responsibly and diligently, and in full conformance with this Statement.

The Company has adopted this Statement to reaffirm and clarify its policy in the areas of compliance with laws, political contributions, payments to government officials or others, giving or receiving gifts, company property, proper accounting, dealing with external and internal auditors, conflicts of interest and the use of inside information. This Statement, therefore, is an expression of the Company’s views on some of the most significant aspects of business ethics and legal compliance. The Statement has not attempted to develop or include an exhaustive list of rules for associate behavior. For this reason, associates should make reference to the policies, handbooks and other materials issued in the Company’s various locations around the world for their guidance. If you still feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company’s ethical standards after referring to these materials, seek help. We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor, contact the Legal Department. The Company has also established an Ethics (via EthicsPoint) hotline that is available 24 hours a day, 7 days a week using hotline phone numbers as posted within the Whistleblower, Accounting and Audit related Complaints Policy. You may remain anonymous and will not be required to reveal your identity in calls to the Ethics Helpline, although providing your identity may assist the Company in addressing your questions or concerns.

This Statement is applicable to Symbol, its associates and all of the associates of its domestic and foreign subsidiaries. Reference to “associates” in this Statement shall be deemed to include all employees of Symbol, as well as the non-employee members of its Board of Directors.

II. Compliance with Laws, Rules and Regulations

The business of the Company shall be conducted in compliance with all applicable laws, rules and regulations. The use of Company funds or assets for any purpose that would be in violation of applicable laws, rules and regulations is prohibited. Compliance with the law means not only observing the letter and spirit of the law, but also conducting our business in such a manner that the Company will deserve and receive recognition as a good and law-abiding citizen. In some cases, the determination of which laws and regulations are applicable and their interpretation may be difficult, but associates have access to in-house legal advice in the United

States and in every country where the Company operates, and should seek such advice within the Company as is necessary to comply with this Statement.

III. Political Contributions

No illegal political contributions of Company funds are to be made, directly or indirectly, to any government official, political party, political party official, election committee or candidate for political office in the United States or in another country. Political contributions on behalf of Symbol may be made in jurisdictions where permitted by law, but only when the Board of Directors of the Company has specifically approved them. Company associates may, of course, contribute personally to the candidates and parties of their choice, but no associate will be compensated or reimbursed for any such personal contribution.

IV. Payments to Government Officials or others

No bribes, kickbacks or other payments shall be made to or for the benefit of any government officials, customers, suppliers or others in connection with obtaining orders or favorable treatment or for any illegal purpose. This policy extends not only to direct payments but also to indirect payments made in any form through consultants or other third parties.

V. Giving or Receiving Gifts

No associate may give, seek or accept in connection with the Company's business any type of compensation, fees, commissions, gifts, entertainment or any other personal favor or preferment which exceeds a nominal value and goes beyond common courtesies associated with accepted business practice. This policy applies to consideration to, or from any person, including, for example, other associates, prospective associates, suppliers, customers, competitors and others with whom the Company has or is likely to have any business relationships. The Company's General Counsel may grant waivers of this policy on a case by case basis after consideration of all facts and circumstances, except in the case of the Chief Operating Officer, Chief Financial Officer, Chief Accounting Officer or Chief Executive Officer.

VI. Company Property

All associates should protect the Company's assets and ensure their efficient use. The Company's assets, whether tangible or intangible, are to be used only by authorized associates or their designees and only for the legitimate business purposes of the Company.

Associates are not permitted to take or make use of, steal, or knowingly misappropriate the assets of the Company, including any confidential information of the Company, for the associate's own use, the use of another or for an improper or illegal purpose. Associates are not permitted to remove or dispose of anything of value belonging to the Company without the Company's consent. No associate may destroy Company assets without permission.

VII. Proper Accounting

It is crucial that all books of account, financial statements and records of the Company reflect the underlying transactions and any disposition of assets in a full, accurate, fair, and timely manner. Our records are the basis of our earnings statements, financial reports and other disclosures to the public and guide our business decision-making and strategic planning.

Company records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files and all other records maintained in the ordinary course of our business. The Company's books and records must, therefore, be complete, accurate, reliable and maintained in accordance with the established financial and accounting policies issued by the Company, and in accordance with Generally Accepted Accounting Practices ("GAAP"). Many of the transactions entered into by the Company entail complex judgments about proper accounting, including proper recognition of revenue by the Company. All personnel responsible for making these judgments are expected to be familiar with the relevant provisions of GAAP, and to apply them accurately and consistently in recording Company transactions. If any associate is uncertain about the proper application of GAAP to a particular transaction, or has a question about the accounting treatment chosen for a particular transaction, that associate should raise such concerns with superiors, internal audit personnel and the Company's General Counsel, or if appropriate, the Audit Committee of the Board of Directors. All assets and liabilities of the Company, and all dispositions of the Company's assets, shall be properly recorded in the Company's books. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited. Failure to abide by these policies is grounds for dismissal.

VIII. Accuracy of Financial Reports and Other Public Communications

As a public company we are subject to various securities laws, regulations and reporting obligations. Both federal law and our policies require the disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the Company and result in legal liability.

The Company's principal financial officers and other employees working in the Finance Department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These associates must understand and strictly comply with GAAP and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

IX. Dealing with Auditors

Free and forthright communication with internal auditors and the Company's independent outside auditors is crucial to the goal of assuring proper accounting for all Company transactions, assets and liabilities. Accordingly, no associate shall knowingly make a false or misleading statement to the Company's internal auditors or independent auditors, nor shall any associate conceal, or fail to reveal, any information necessary to make the statements made to such auditors not misleading. In that connection, no associate, or any person acting under his or her direction, shall directly or indirectly take any action to coerce, manipulate, mislead or fraudulently influence any of the Company's internal auditors or independent auditors if the associate knows (or should know) that his or her actions, if successful, could result in rendering the Company's financial statements materially misleading. Specifically, no associate may take any action that he or she knows (or should know) could cause an auditor to:

- issue or reissue a report on the Company's financial statements that is not warranted in the circumstances (due to material violations of GAAP, Generally Accepted Auditing Standards ("GAAS") or other professional or regulatory standards);

- fail to perform audit, review or other procedures required by GAAS or other professional standards;
- fail to withdraw an issued report; or
- fail to communicate matters to the Audit Committee of the Board of Directors.

In short, absolute candor with our auditors is a mandatory condition of your employment. All associates shall cooperate fully with internal and independent auditors in the performance of their duties.

Finally, the Company has established a special Help Desk. If you have any questions concerning any financial issues, please call the Vice President, Internal Audit, at 631-738-4460.

X. Fair Dealing

Each associate should endeavor to deal fairly with the Company's customers, suppliers, competitors and associates. No associate should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

XI. Conflicts of Interest

No associate of the Company shall use his or her position to benefit any other business or person outside the Company, or to benefit the associate independently of the Company's business. This means, for example, that no associate of the Company, or any member of his or her family, shall directly or indirectly, participate in, or have a significant connection with, any business which competes with or is a supplier or customer to the Company unless that participation is made known to the Company and approved in writing by the General Counsel of the Company or his designee (or if the disclosure is by the General Counsel of the Company, approval must be in writing by the Chief Executive Officer). If an instance occurs in which it is to the Company's advantage to enter into a transaction with such a business, evidence of competitive bidding or other conditions that assure an arm's length relationship will be required. Ownership of stock in a publicly held company which may deal or compete with the Company will not violate this Policy, as long as the associate owns the lesser of (i) outstanding stock of that publicly held company which constitutes less than 1% of the stock or (ii) stock having a market value of less than \$100,000.

A Symbol associate may not accept appointment to membership of the Board of Directors, standing committee or similar body of any outside company, organization or government agency other than charitable, educational, fraternal, political, community or religious organizations without first receiving the prior approval of the Company's General Counsel.

XII. Disclosure of Conflicts of Interest

The Company requires that associates disclose any situations that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it to your supervisor or the Legal Department. Your supervisor and the Legal Department will work

with you to determine whether you have a conflict of interest and, if so, how best to address it. Although conflicts of interest are not automatically prohibited, they are not desirable and may only be waived as described in “Waivers and Amendments” below.

XIII. Non-Solicitation

In the interest of maintaining a proper work environment and preventing undue pressure on associates, managers may not sell merchandise to, or solicit financial contributions or other participation from, associates who report to them, either directly or indirectly. The sole exception for this policy is Company-sponsored charitable solicitations, such as the United Way, blood drives or other sponsored charitable drives. Solicitation by associates of those who are neither direct or indirect reports is not prohibited, provided, that such participation does not interfere with work, inconvenience others or involve any activity that would otherwise constitute a violation of this Statement.

XIV. Corporate Opportunities

As an associate of the Company, you have an obligation to advance the Company’s interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property, information or because of your position with the Company that is in the Company’s line of business, you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No associate may use corporate property, information or his or her position with the Company for personal gain.

You should disclose to your supervisor the terms and conditions of each business opportunity covered by this Statement that you wish to pursue. Your supervisor will contact the Legal Department and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Statement.

XV. Use of Inside Information

“Inside information” is any material financial, technical (including software) or other information which is not known to the public, and which an associate obtains in the course of his or her employment. The use or disclosure of inside information for the purpose of obtaining personal financial gain or which enables any other person or business to attempt to make such gains is strictly forbidden. Company associates are prohibited from trading in the stock or other securities of the Company while in possession of material, nonpublic information about the Company. In addition, Company associates are prohibited from recommending, “tipping” or suggesting that anyone else buy or sell stock or other securities of the Company on the basis of material, nonpublic information.

Furthermore, no associate shall make any unauthorized disclosure of any confidential or inside information to any persons not affiliated with the Company except in the performance of his or her duties for the Company. Before any of Symbol’s confidential product information is provided to potential suppliers, an authorized representative of the supplier shall first sign a Proprietary Information Agreement. The Purchasing Departments are responsible for

maintaining a current copy of the agreement for any suppliers or potential suppliers who are provided with proprietary information.

XVI. Annual Letter of Representation of Compliance

Annually, selected associates will be requested to furnish a letter of representation of their compliance with this Statement. It is the personal responsibility of each and every associate of the Company to observe and strictly abide by this Statement. All associates are requested to report promptly to any circumstance, which involves or may appear to involve deviation from the policies stated here. Reporting in good faith possible violations by other associates of the policies stated here will not subject associates to reprisal. In fact, retaliation or punishment for reporting suspected unethical or illegal conduct by another associate or for coming forward to alert the Company of any questionable situation is against the law. The Company has implemented an ethics hotline to facilitate the reporting of improper conduct.

XVII. Waivers and Amendments

In certain limited situations, the Company may waive application of this Statement to associates. Notwithstanding the foregoing, with respect to executive officers and directors, any such waiver requires the express approval of the Board of Directors (or a committee of the Board of Directors) except as otherwise set forth herein. Furthermore, the Company will promptly disclose to its stockholders as required by law or the rules of the New York Stock Exchange any such waivers granted to any of its executive officers or directors.

XVIII. Disciplinary Action

Any associate involved in a violation of this Statement will be subject to disciplinary action according to local laws and regulations, applicable Company disciplinary procedure and any agreements that may exist in an operating unit or subsidiary. Subject to local laws and regulations, the penalties imposed by the Company may include a warning, reprimand, probation, suspension, reduction in salary, demotion or dismissal. Violations will be dealt with as promptly as possible and serious violations must, of course, be dealt with severely.

XIX. Reporting Violations of the Statement

All associates have a duty to report any known or suspected violation of this Statement, including any violation of the laws, rules, regulations or policies that apply to the Company. If you know of or suspect a violation of this Statement, immediately report the conduct to your supervisor. Your supervisor will contact the Legal Department, which will work with you and your supervisor to investigate your concern. If you do not feel comfortable reporting the conduct to your supervisor or you do not get a satisfactory response, you may contact the Legal Department directly. You may also report known or suspected violations of the Statement on the EthicsPoint hotline, which is available 24 hours a day, 7 days a week. You may remain anonymous and will not be required to reveal your identity in calls to the Ethics Helpline, although providing your identity may assist the Company in investigating your concern.

All reports of known or suspected violations of the law or this Statement will be handled sensitively and with discretion. Your supervisor, the Legal Department and the Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern.

It is Company policy that any associate who violates this Statement will be subject to appropriate discipline, which may include termination of employment. This determination will be based upon the facts and circumstances of each particular situation. Associates who violate the law or this Statement may expose themselves to substantial civil damages, criminal fines and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Your conduct as a representative of the Company, if it does not comply with the law or with this Statement, can result in serious consequences for both you and the Company.

XX. Policy Against Retaliation

The Company strictly prohibits retaliation against an associate who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an associate because the associate, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment.

XXI. Review of this Statement

Management and the Board of Directors of Symbol shall review this Statement periodically with a view to making any appropriate policy changes in this Statement or its implementation.

XXII. Responsibility of Compliance and Interpretation

The Company's President and Chief Executive Officer is responsible to the Board of Directors for monitoring compliance with this Statement. Management level associates are responsible for communication of and compliance with this Statement within their respective organizations.

On all questions of compliance and interpretation, appropriate legal and accounting staff should be consulted. Questions regarding this Statement, which cannot be answered by the management level associates, shall be referred to the Company's General Counsel.

XXIII. Disclosure of this Statement

This Statement shall be made available on the Company's website at "www.symbol.com" and to any stockholder who otherwise requests a copy. The Company's Annual Report to Stockholders shall state the foregoing.

This Statement, as applied to the Company's principal financial officers, shall be our "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Statement and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. We reserve the right to amend or supplement this Statement and the matters addressed herein, without prior notice, at any time.